

REMARKS

The Applicants respectfully submit this Amendment and Request for Reconsideration in response to the Office Action mailed on 14 July 2006, entry and consideration of which is earnestly solicited.

The present Amendment cancels claims 1, 4, 5-7, 10-15, and 18-23, and adds new claims 26-38. Therefore, new claims 26-38 are pending in the present application for consideration. Note that new independent claims 26, 31, and 36 are similar in scope to previous independent claims 1, 7, and 15 which are now canceled. As required by 35 U.S.C. Sect. 132, no new matter has been added. The new claims 26-38 are fully supported by the original application as filed.

*In the Office Action mailed on 14 July 2006, the Examiner rejected claims of the present application as directed to non-statutory subject matter under 35 U.S.C. § 101. In response, the Applicant respectfully disagrees with the rejection and submits that the new claims as presented are both directed to proper statutory subject matter and are allowable over the prior art of record for at least the following reasons.*

The Examiner requested the Applicant to specify the following in the claimed limitations: (1) What is the practical application? and (2) What is the final result which Applicant considers concrete, useful, and tangible?

Regarding claim 26, the Applicant respectfully submits that the practical application is *data compression involving a data compressor* and the final result which is concrete, useful, and tangible is *lexicographically sorted cyclic shifts of data* for data compression.

Regarding claim 31, the Applicant respectfully submits that the practical application again is *data compression involving a data compressor* and the final result which is concrete, useful, and tangible is *lexicographically sorted cyclic shifts of data* for

data compression. Computer instructions of the computer program product are *executable by a processor* for lexicographically sorting the data.

Regarding claim 36, the Applicant respectfully submits that the practical application is *a data compressor adapted to generate compressed data* which is in a *system for communicating data having a wireless packet data network, a mobile communication device which operates in the wireless packet data network, and a computer coupled to the wireless packet data network*, the final result which is concrete, useful, and tangible is *lexicographically sorted cyclic shifts of data* for the data compressor.

Claims dependent from claims 26, 31, and 36 are directed to statutory subject matter for the same reasons as their corresponding independent claim.

As apparent, all claims are clearly directed to proper statutory subject matter, and the Applicant respectfully requests the Examiner to withdraw such § 101 rejections.

Finally, the Applicant respectfully submits that newly-presented claims 26-38 are allowable over the prior art of record as being novel and non-obvious, at least for the reason that such claims are directed to *techniques utilizing an inverse sorting array of indexes*, where each array element at index  $i$  of the inverse sorting array is the index of the array element in a sorting array containing the index  $i$ . The prior art of record does not teach or suggest use of the same, and fails to render obvious the use of such array.

The Applicant respectfully requests entry of the Amendment, reconsideration of the application as amended, and allowance of the application as all statutory requirements have been met.

Thank you. Please feel free to contact the undersigned if there are any questions or concerns regarding this submission.

Respectfully submitted,

/John J. Oskorep/

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